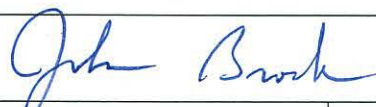



Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105
RCRA INSPECTION REPORT

Inspection Date(s):	3/17/16	Inspection Announced: No	
Time:	Entry: 9:20 am	Exit: 12:20 pm	
Regulatory Program(s)	RCRA Subtitle C (Hazardous Waste)		
Company Name:	Valkyrie Industries, Inc.		
Facility or Site Name:	n/a		
Facility/Site Physical Location:	6033 West Sherman Street		
(city, state, zip code)	Phoenix, AZ 85043		
County	Maricopa		
Facility/Site Contact:	Richard Sanchez	General Manager	
	rsanchez@valwest.com		
	(602) 272-7131		
Facility/Site Identifier:	AZD0981433980		
Generator Status	Small Quantity Generator (SQG)		
NAICS:	332813		
Facility/Site Personnel Participating in Inspection:			
Richard Sanchez	Valkyrie	General Manager	
Inspector(s):			
John Brock (Lead)			5-9-16
	US EPA Region 9, ENF-2-2	RCRA Inspector	
	brock.john@epa.gov	(415) 972-3999	
Rick Sakow <i>RS 5/9/16</i>	US EPA Region 9, ENF-2-2		RCRA Inspector
	sakow.rick@epa.gov	(415) 972-3495	
ADEQ Inspector(s):	Lori Plato	(800) 234-5677	
	Inspections and Compliance	(800)234-5677	
Supervisor Review:			
Douglas McDaniel			05/09/16
	Waste and Chemical Section	Chief	(415) 947-4106

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine Valkyrie Industries' ("Valkyrie") compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, Arizona's authorized hazardous waste program in the Arizona Revised Statutes, Title 49 and the Arizona Administrative Code, Title 18, Chapter 8, Article 2.

Opening Conference

EPA Region 9 inspectors John Brock and Rick Sakow arrived at the Valkyrie at 9:00 am on March 17, 2016 for a routine unannounced compliance evaluation inspection (CEI). We met with Richard Sanchez of Valkyrie at the opening conference of the inspection. We presented our credentials to the facility representatives and informed them that this was an EPA inspection to determine Valkyrie's compliance with RCRA regulations.

Facility/Site Description

Valkyrie is a metal finishing facility in operation since 2002. Prior to Valkyrie it was known as Anocad Plating. Valkyrie employs approximately six persons at the facility. They operate 8 hours a day 5 days a week. ADEQ last inspected them on July 16, 2014. Numerous violations were observed during the inspection. ADEQ's report states that Valkyrie generates the following waste codes: D002, D007, D035, and F007.

SECTION II – OBSERVATIONS AND AREAS OF CONCERN

The on-site inspection portion of the CEI started in the main office area and proceeded to the metal finishing shop (electroplating room and anodizing room), the paint area and the wastewater treatment area (including the filter press), and concluded back in the main office. There was one 180-day hazardous waste accumulation area and one satellite accumulation area (SAA).

No areas of concern were observed during the facility walkthrough.

Records Review

The inspectors reviewed hazardous waste manifests and land disposal restrictions (LDRs) from 2013 – 2015, weekly inspection checklists for the less than 180-day HWAA, and the facility contingency plan. No issues were identified. The inspectors asked to review Valkyrie' training plan and training records. Only Mr. Sanchez was trained; he supervises the others.

Closing Conference

The inspectors conveyed preliminary inspection findings to Mr. Sanchez and concluded the inspection at approximately 12:20 pm. We advised Mr. Sanchez to clean up their paint storage area and dispose of any unwanted products.